

MARA FLAMM V. SARNER & ASSOCIATES, P.C., ET AL.

**MOTION OF ATTORNEY DEFENDANTS TO DISMISS PLAINTIFF'S
COMPLAINT PURSUANT TO RULES 12(b)(1) AND 12(b)(6)**

DEFENDANTS' EXHIBIT 4

October 18, 2001 Letter, Josh Sarner to Plaintiff

SARNER & ASSOCIATES
A PROFESSIONAL CORPORATION OF ATTORNEYS AT LAW

LEONARD SARNER
JOSHUA SARNER*
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October 18, 2001

Via Certified Mail, RRR

Ms. Mara Flamm
709 South Schell Street
Philadelphia, PA 19147

RE: Jodi H. Brown, M.D. vs. Mara Flamm

Dear Ms. Flamm.

Enclosed please find a Notice of Taking Deposition in Aid of Execution in the above-referenced matter.

Sincerely,

JOSH SARNER

JS:lbh-a
Enclosure
cc: First Class Mail

2 215 638 739

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	Mara Flamm
Street & Number	709 S. Schell St
Post Office, State, & ZIP Code	PA 19147
Postage	\$
Certified Fee	
Special Delivery Fee	
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Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

Form 3800, April 1995

SARNER & ASSOCIATES
By: Joshua Sarner, Esquire
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11 Penn Center, 29th Floor
Philadelphia, PA 19103
215-496-1396
Attorneys for Plaintiff

IN THE PHILADELPHIA MUNICIPAL COURT

JODI H. BROWN, M.D.,

Plaintiff,

v.

MARA FLAMM,

Defendant,

No. SC-01-02-20-1994

NOTICE OF TAKING DEPOSITION IN AID OF EXECUTION

To: Mara Flamm
C/O Peirce College
1420 Pine Street
Philadelphia, PA 19102-4699

Mara Flamm
709 S. Schell Street
Philadelphia, PA 19147

PLEASE TAKE NOTICE that, pursuant to Pennsylvania Rule of Civil Procedure 3117, the undersigned will take the deposition upon oral examination of Mara Flamm, before a notary public or other person authorized by law to administer oaths. The deposition will commence on December 5, 2001, at 10:00 a.m., and continue from day to day until completed, unless otherwise adjourned. The testimony will be taken at the offices of Sarner & Associates, 11 Penn Center - 29th Floor, 1835 Market Street, Philadelphia, PA 19103, at which time and place Defendant is directed to appear and bring with him/her the following:

1. All of Defendant's tax returns and supporting schedules (federal, state and local) which were filed, either individually or jointly, for the calendar years 1998 to the present.
2. All passbooks, statements and deposit slips for the preceding twelve (12) months for any savings account, money market account, trust account, IRA accounts, 401(k) account, KEOGH plan, interest bearing account or similar account at any bank, savings institution, credit union or other financial institution held by Defendant, either individually or jointly.
3. All statements, canceled checks, deposit slips and checkbook registers for the preceding twelve (12) months for any checking account held in Defendant's name, either individually or jointly.
4. All stocks, bonds or other securities of any kind whatsoever owned by Defendant, individually or jointly, a list of all securities held by any other persons, brokerage houses or banks for Defendant in trust, by pledge or otherwise; and all statements, invoices and other documents from brokers or brokerage services in connection therewith.
5. Any and all insurance policies or riders thereto, for the years 1998 to the present, which cover the loss of personal property where the Defendant is a named beneficiary.
6. A list of all real estate owned by Defendant, or in which Defendant has or had any interest of any kind whatsoever, or which someone else held for Defendant in trust or otherwise, during the preceding twelve (12) months.
7. Any and all financial statements whether prepared by or for the Defendant during the preceding twenty-four (24) months.
8. Any application for a loan made by the Defendant, either individually or jointly, during the past twenty-four (24) months.

9. All deeds, indentures, bonds, mortgages, title insurance policies, public liability insurance policies, tax bills, leases, and all other documents evidencing any legal or equitable interest in real estate owned by Defendant, or in which he/she has or had within the last twenty four (24) months any interest of any kind whatsoever or which someone else holds for him/her in trust or otherwise.

10. Any and all certificates of deposit, promissory notes, security agreements, mortgages, mechanic's liens, or other evidences of indebtedness of any kind whatsoever owing to Defendant, individually or jointly, or held for Defendant in trust or otherwise.

11. A list of all motor vehicles, mobile homes, or boats owned by Defendant, either individually or jointly.

12. Any and all vehicle registration cards, titles, insurance policies, and all other documents evidencing any legal or equitable interest in any motor vehicles, mobile homes or boats owned by Defendant during the preceding twenty-four (24) months, or in which the Defendant has had any interest of any kind whatsoever or which someone else holds or has held for the Defendant in trust or otherwise.

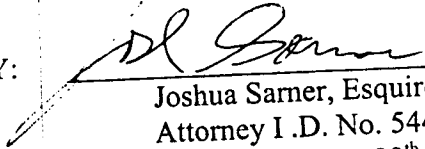
13. All documents reflecting the Defendant's right to receive royalties from any source.

14. The names and locations of all banks or other institutions in which the Defendant rents or rented in the last twenty-four (24) months, a safe deposit box, and the keys thereto.

15. All documents evidencing if the Defendant is a beneficiary of any trust.

SARNER & ASSOCIATES

BY:



Joshua Sarnar, Esquire
Attorney I.D. No. 54463
11 Penn Center - 29th Floor
1835 Market Street
Philadelphia, PA 19103
Phone: 215-496-1396
Fax: 215-568-1044

Dated: 10/19/01